

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

TENNESSEE CONFERENCE of the NATIONAL
ASSOCIATION for the ADVANCEMENT of
COLORED PEOPLE, et al.,

Plaintiffs,

v.

WILLIAM LEE, in his official capacity as Governor of
the State of Tennessee, et al.,

Defendants.

Civil No. 3:20-cv-01039

JUDGE CAMPBELL
MAGISTRATE JUDGE
FRENSLEY

(Class Action)

**PLAINTIFFS' MOTION TO EXPEDITE CONSIDERATION OF MOTION FOR
RELIEF UNDER RULE 56(d)/MOTION FOR EXTENSION OF TIME TO FILE
RESPONSE IN OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY
JUDGMENT**

Pursuant to LR 7.01(c), Plaintiffs respectfully request expedited consideration of Plaintiffs' Motion for Relief Under Rule 56(d) and Motion for Extension of Time to File Response in Opposition to Defendants' Motion for Summary Judgment. Plaintiffs' motion under Rule 56(d) requests to reopen discovery to gather necessary evidence concerning Defendants' new rights restoration policies released on July 21 after the close of discovery. Plaintiffs have determined that such discovery is necessary to prepare their response in opposition to Defendants' Motion for Summary Judgment, which is currently due on September 22. Plaintiffs move to extend that quickly approaching deadline pending the Court's consideration of Plaintiffs' request for relief under Rule 56(d). Expedited consideration of these requests is necessary to afford Plaintiffs the relief they seek under Rule 56(d). Plaintiffs propose that Defendants' response to this motion be

filed no later than Friday, September 15, 2023 and Plaintiffs' reply no later than Monday, September 18, 2023.

Defendants oppose this motion to expedite.

Dated: September 12, 2023

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Counsel for the Petitioners-Plaintiffs and the Class

CERTIFICATE OF SERVICE

I hereby certify that on September 12, 2023, a copy of the foregoing PLAINTIFFS' MOTION FOR RELIEF UNDER RULE 56(d)/MOTION FOR EXTENSION OF TIME TO FILE RESPONSE IN OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT was filed electronically. Notice of this filing will be served by operation of the Court's electronic filing system to counsel for parties below. Counsel for the parties may access these filings through the Court's electronic filing system:

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